



SDMS DocID 2178101

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

PFE ORIGINAL

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAR 25 2013

Mr. Terry D. Brown
1919 Garfield Street
Laramie, WY 82070-4336

Re: Safety Light Corporation Site

Dear Mr. Brown:

As you know, Mr. Steinmetz of my staff has tried to reach you by telephone numerous times, the most recent being on February 20, 2013. Failing at that, he left his telephone number for a return call which he never received from you, hence, this written information request.

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of release, of hazardous substances, pollutants or contaminants into the environment at the the Safety Light Corporation Site, which was a manufacturing facility occupying approximately 2 acres of a 10-acre property adjacent to the Susquehanna River off Old Berwick Road in Bloomsburg, Pennsylvania (hereafter known as the "Site" or "facility"). This information request addresses all periods of ownership and operation of any of Safety Light's predecessor or affiliated companies including, but not limited to, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation and Shield Source Inc. Most recently, Safety Light Corporation used tritium in the manufacture of self-illuminated signs. Past disposal practices of various radioactive isotopes at the Site have resulted in radiological contamination of soils and groundwater on site.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), EPA has the authority to require you to furnish all information and documents in your possession, custody or control, or in the possession, custody or control of any of your employees or agents, which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), and pollutants and/or contaminants as defined by Section 101(33), 42 U.S.C. Section 9601(33), which were transported to, stored, treated, or disposed of at the above-referenced Facility.



Section 104 of CERCLA authorizes EPA to pursue penalties for failure to comply with that section or for failure to respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

INSTRUCTIONS

If asserting a business confidentiality claim on information submitted in response to this request, please clearly mark such information by either stamping or using any other such form of notice that such information is trade secret, proprietary, or company confidential.

INFORMATION REQUESTED

1. Provide the dates that you were employed by Safety Light Corporation, its predecessor or affiliated companies including, but not limited to, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation and Shield Source Incorporated (hereinafter referred to as "Safety Light or its affiliates")?
2. Of the companies listed in Information Request #1, which entity or entities were your actual employer(s) while you were employed at the Site?
3. What was your occupation and title while employed at the Site?
4. What were your responsibilities while employed at the Site?
5. Describe any and all transactions in which materials containing radionuclides, including but not limited to spent/expired radioluminescent products (hereinafter referred to as "materials"), were returned or sent to the Site for disposal, by Safety Light customers and other entities.
 - a. Describe how Safety Light or its affiliates handled such materials, from the time such materials were received on-Site, until final disposition of such materials.
 - b. Provide a description of the location(s) on the Site where such materials were received.
 - c. Provide a description of the location(s) on the Site where such materials were stored.

- d. Provide a description of the location(s) on the Site where such materials were disposed of (for example: buried, discarded, spilled, leaked).
 - e. If such materials were disposed of off-site by Safety Light or its affiliates, provide the off-site location.
 - f. Approximately what quantity of such materials were received at the Site for disposal from customers and other entities, during your employment or during any other time period about which you may have knowledge?
6. Describe how wastes containing radionuclides and/or other hazardous substances were handled at the Site, during the time period you were employed at the Site, and any other time period about which you have knowledge or information.
- a. Describe the types of wastes handled at the Site that contained radionuclides.
 - b. Describe the location(s) at the Site where wastes containing radionuclides were stored.
 - c. Describe the location(s) at the Site where wastes containing radionuclides were disposed of, and the dates during which such disposal occurred.
 - d. If wastes containing radionuclides were disposed off-site, provide the location(s) of disposal.
 - e. Approximately what quantity of wastes containing radionuclides was generated by manufacturing activities at the Site during your employment (by month or by year)?
 - f. Describe the storage and disposal location(s) at the Site where hazardous substances, other than those containing radionuclides, were handled.
7. Describe the types of documents generated or maintained by Safety Light or its affiliates concerning the storage, disposal or other handling of wastes containing radionuclides at the Site.
- a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents.

8. To the best of your recollection, identify all entities or persons who arranged by contract, agreement, or otherwise, for the disposal of materials at the Site, or arranged with a transporter for the transportation of materials to the Site (either directly or through transshipment points) for disposal. Such persons hereinafter will be referred to as "Generators."
9. To the best of your recollection for each Generator identified in response to question 8:
 - a. Identify the Generator and provide any known contact information (for example, the Generator's most recent or last known address and/or telephone number).
 - b. Provide the approximate date(s) on which each Generator made such arrangements.
 - c. Describe the type and quantity of radionuclides or other hazardous substances contained in the materials involved in each arrangement.
 - d. With regard to each material described in Paragraph 9.c., above, describe all tests, analyses, analytical results, or manifests with respect to the arrangement.
 - e. Describe as precisely as possible any and all of the locations at the Site or outside the Site where each material involved in such transactions ultimately was disposed of.
 - f. Identify the mode of transportation used by each Generator to transport materials to the Site (for example: rail, U.S. mail, third-party hauler, etc.).
 - g. Identify and provide the names of any employees of Safety Light or its affiliates with whom each Generator would have made such arrangements.
 - h. State the amount of money paid or other consideration given in connection with each arrangement, and the method of payment.
 - i. Describe the intent of each Generator identified in paragraph 9.a., above, regarding the materials it returned or sent to the Site, and describe or identify all documents or other information (written or oral) that existed to evidence their intent.

- j. Describe all intermediate sites where the materials involved in each arrangement were transshipped, or where they were stored or held, any time prior to final disposal.
 - k. Describe all documents or other information (written or oral) concerning the intermediate sites, including a description of the information included in each type of document and the identity of the person who was the custodian of the documents.
 - l. With respect to each material described in Paragraph 9.c., above, describe the manner in which the material was handled upon and after delivery to the Site (e.g., storage methods, logging in procedures, and disposal methods).
 - m. Describe the final disposition of each material involved in each arrangement.
 - n. Describe the measures taken by the Generator to determine how and where disposal of the materials involved in each arrangement would occur.
10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents they may have.
11. For each question contained herein, if information or documents responsive to this Information Request is not in your possession, custody, or control, identify the persons from whom such information or documents may be obtained.
12. For each question contained herein, identify all documents consulted, examined, or referred to in preparation of the answer or that contain information responsive to the question, and provide true and accurate copies of all such documents.

Authority to require submission of this type of information has been given to EPA by Congress under Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. § 9604(e).

You are entitled to assert a claim of business confidentiality covering all or any part of the submitted information, in the manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted at the time the required information is submitted to EPA, EPA may make this information

available to the public without further notice to Safety Light. Further, if for any reason Safety Light does not provide all information responsive to this letter, in its answer to EPA it must: (1) describe specifically what was not provided, (2) supply to EPA a clear identification of the documents(s) not provided, and (3) provide to EPA an appropriate reason why the document(s) was not provided.

EPA may contract with one or more independent contracting firms (see attached list of EPA contractors and cooperative agreement grantees) to review the documentation, including documents which you claim are confidential business information ("CBI"), which it submits in response to this information request, depending on available agency resources. Additionally, EPA may provide access to this information to (an) individual(s) working under (a) cooperative agreement(s) under the Senior Environmental Employment Program (SEE Enrollees). The SEE program was authorized by the Environmental Programs Assistance Act of 1984 (Pub. L. 98-313). The contractor(s) and/or SEE Enrollee(s) will be filing, organizing, analyzing and/or summarizing the information for agency personnel. The contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that they handle for EPA. The SEE Enrollee(s) is working under a cooperative agreement that contains a provision concerning the treatment and safeguarding of CBI. The individual SEE enrollee has also signed a confidentiality agreement regarding treatment of CBI. Pursuant to CERCLA, 42 U.S.C. § 9604(e)(7), and EPA's regulations at 40 C.F.R. § 2.310(h), EPA may share such CBI with EPA's authorized representatives which include contractors and cooperators under the Environmental Programs Assistance Act of 1984. (See 58 Fed. Reg. 7187 (1993)). If Safety Light has any objection to disclosure by EPA of documents which it claims are CBI to any or all of the entities listed in the attachment, Safety Light must notify EPA in writing at the time it submits such documents.

This required submission of information is not subject to the approval requirements under the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

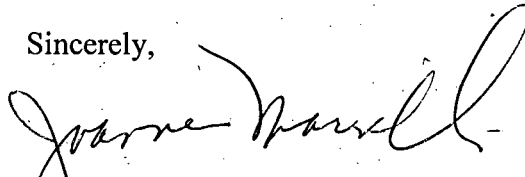
We appreciate and look forward to your prompt response to this letter. Any questions you may have regarding the current status of this Site in the Superfund process can be directed to Mitch Cron, the Site Remedial Project Manager at 215/814-3286.

If, for a particular reason, you are hesitant to answer this letter because you are concerned about public disclosure of your name in connection with the information you are required to submit, please clearly advise EPA in the response that you request confidential treatment of your identity. EPA cannot guarantee confidentiality and does not encourage such a request, but we recognize that it may be appropriate in certain instances. In the event that you do request confidential treatment of your identity, EPA will evaluate whether such confidential treatment is warranted in this case. Please do not request confidential treatment of your identity unless you believe it is necessary. All documents and information should be sent to:

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103.

If you have any questions, please feel free to contact Mr. Steinmetz at 215/814-3161.
Legal questions can be directed to Humane Zia, the Site attorney, at 215/814-3454.

Sincerely,



Joanne Marinelli, Chief
Cost Recovery Branch

Enclosure

cc: Humane Zia, Esq. (EPA)
Mitch Cron (EPA)
Jeff Whitehead (PADEP)
Noreen Wagner (PADEP)
John Angevine (PADEP)

Enclosure A

[rev. 10/2012]

List of Contractors That May Review Your Response

Emergint Technologies, Inc.

Contract # EP-W-11-025

Subcontractor: Booz-Allen & Hamilton

Booz-Allen & Hamilton

Contract # GS-35F-0306J (GSA Schedule)

CDM-Federal Programs Corporation

Contract # EP-S3-07-06

Subcontractors: L. Robert Kimball & Associates Inc.
Avatar Environmental LLC
Terradon Corporation

Chenega Global Services, LLC

Contract #EP-S3-09-02

EA Engineering, Science and Technology, Inc.

Contract #EP-S3-07-07

Subcontractor: URS

Eisenstein Malanchuck, LLP

Contract #EP-W-07-079

Subcontractors: R. M. Fields International, LLC
James C. Hermann & Associated

Hydrogeologic (HGL)

Contract #EP-S3-07-05

Subcontractor: CH2MHill
Sullivan International

Weston Solutions

Contract #EP-S3-1005

Tech Law, Inc.

Contract #EP-S3-1004

Tetra Tech NUS, Inc.

Contract #EP-S3-07-04

Kemron Environmental Services, Inc.

Contract #EP-S3-12-01,

Subcontractor: AECOM Technical Services, Inc.

Guardian Environmental Services Company, Inc.

Contract #EP-S3-12-02,

Subcontractors: Aerotek, Inc.,
Tetra Tech, Inc.

Environmental Restoration, LLC

Contract # EP-S3-12-03

Subcontractors: Aerotek, Inc
Haas Environmental, Inc,
Hertz

WRS Infrastructure & Environment, Inc.

Contract # EP-S3-12-05

Industrial Economics, Inc.

Contract # EP-W-06-092

Cooperative Agreements

National Association of Hispanic Elderly

CA# Q83424401

CA # ARRA 2Q8343730-01

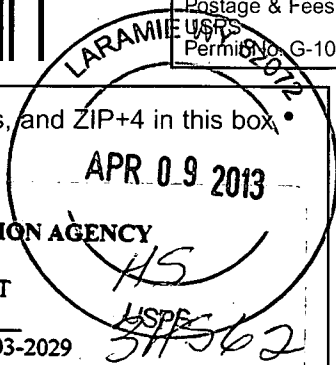
National Older Workers Career Center

CA# Q-835030

UNITED STATES POSTAL SERVICE

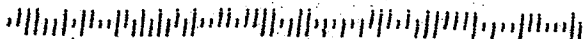


First-Class Mail
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• Sender: Please print your name, address, and ZIP+4 in this box. •

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 ARCH STREET
MAIL CODE _____
PHILADELPHIA, PA 19103-2029
OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE \$300



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Terry D. Brown
1919 Garfield Street
Laramie, WY 82070-4336

2. Article Number

(Transfer from service label)

PS Form 3811, August 2001

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Terry D. Brown*

☐ Agent

☐ Addressee

B. Received by (Printed Name)

TERRY D. BROWN

C. Date of Delivery

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Insured Mail

☒ Return Receipt for Merchandise

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

7003 1680 0005 4384 3136

Domestic Return Receipt

102595-02-M-1035

7003 1680 0005 4384 3136

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Total Payment

Sent To

Mr. Terry D. Brown

Street, Apt.
or PO Box

1919 Garfield Street

City, State

Laramie, WY 82070-4336

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- A record of delivery kept by the Postal Service for two years

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- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry. Internet access to delivery information is not available on mail addressed to APOs and FPOs.

PS Form 3800, June 2002 (Reverse)